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March 10, 2004

Thomas M. Dorman, Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, Kentucky 40602-0615

RECEIVED  
MAR 11 2004  
PUBLIC SERVICE  
COMMISSION

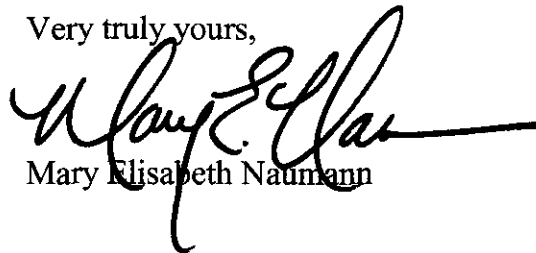
Re: PSC Case No. 2003-00400

Dear Mr. Dorman:

Enclosed please find Cingular Wireless's Initial Request for Production of Documents and Interrogatories to Complainant for the above referenced case, along with eleven copies. Please file this and return one file stamped copy to us via the enclosed envelope.

If you should have any questions regarding this, please call me.

Very truly yours,



Mary Elisabeth Naumann

Enclosures

cc: Saeid Shafizadeh, Complainant  
BellSouth Mobility, LLC

MEN/kmj  
5864/321/354640

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

MAR 11 2004

PUBLIC SERVICE  
COMMISSION

In the matter of:

SAEID SHAFIZADEH

COMPLAINANT

CASE NO.: 2003-00400

v.

CINGULAR WIRELESS-KENTUCKY

DEFENDANT

**CINGULAR WIRELESS'S INITIAL REQUEST FOR PRODUCTION OF DOCUMENTS  
AND INTERROGATORIES TO COMPLAINANT**

The February 24, 2004 Scheduling Order in this proceeding requires service of initial discovery requests on or before March 9, 2004. On March 8, 2004, BellSouth Mobility, LLC d/b/a Cingular Wireless ("Cingular"), filed its Request for Informal Conference and to Suspend Scheduling Order ("Request to Suspend Deadlines") in which Cingular requested that the Public Service Commission ("Commission") suspend the deadlines set forth in the Scheduling Order, including the discovery deadlines. Due to the fact that an order has not been entered on the Request to Suspend Deadlines, Cingular submits the following initial requests for production of documents and interrogatories to the Complainant in order to protect its rights to submit such requests, but in light of the Request to Suspend Deadlines, reserves its right to amend and supplement these requests in the event that the Scheduling Order is amended and in accordance with any determinations as to the Commission's jurisdiction over the various issues the Complainant raised in this proceeding.

In accordance with the preceding paragraph, Cingular, by counsel and pursuant to the

Scheduling Order, tenders the following initial interrogatories and requests for production of documents to Complainant to be answered under oath and within ten (10) days from the date of service.

### **INTERROGATORIES**

**INTERROGATORY NO. 1:** Please state the names and addresses of all persons assisting in the preparation of the answers to these interrogatories and indicate which persons answered which interrogatories.

#### **RESPONSE NO. 1:**

**INTERROGATORY NO. 2:** Please identify all persons, with addresses and telephone numbers, you intend to call as fact witnesses at the formal hearing of this matter and provide (a) a summary of the substance of the facts to which each witness is expected to testify and (b) a list of exhibits you plan to introduce through each such witness.

#### **RESPONSE NO. 2:**

**INTERROGATORY NO. 3:** For each person that you expect to testify as an expert witness at the formal hearing of this matter, please state the following:

- a. The name, address and occupation of that witness;
- b. The subject matter or area on which such expert is expected to testify;
- c. The substance of the facts and opinions to which the expert is expected to testify;  
and
- d. A summary of the grounds for each opinion identified above.

#### **RESPONSE NO. 3:**

**INTERROGATORY NO. 4:** Please identify the Complainant fully, giving his full name, date of birth, residence address, business address, occupation, social security number, marital status, and if applicable, names of current and former spouses.

**RESPONSE NO. 4:**

**INTERROGATORY NO. 5.** To the best of your knowledge, please identify, including names, addresses, and business and home telephone numbers, any and all persons with knowledge of the facts and circumstances of the claims that are the subject of this matter, including a brief description of the facts and circumstances each person identified should have.

**RESPONSE NO. 5:**

**INTERROGATORY NO. 6.** Please state the substance of any conversation you or anyone on your behalf, including your attorney, had with any agent, servant, representative, and/or employee of Cingular with regard to the subject matter of this litigation, identifying (a) the name, address, and telephone number of the person with whom such conversation was had; (b) the date of the conversation; and (c) the subject of the conversation.

**RESPONSE NO. 6:**

**INTERROGATORY NO. 7.** To the extent that such contacts are not listed in Interrogatory No. 6 above, please identify each contact you or anyone on your behalf had with Cingular or Cingular customer service personnel concerning the dispute at issue in this matter, including the date of the contact; the name of the person contacted; the means of contact; the subject

of the contact; and if the contact was via telephone or wireless connection, the time, if any, Complainant was put on hold and what telephonic messages, if any, were heard in that contact.

**RESPONSE NO. 7:**

**INTERROGATORY NO. 8.** Please describe with specificity any and all damages, of any kind, that you are requesting relief from in the instant action, including an itemized list of the dates of loss, type of loss sustained, and the monetary values for all of the damages identified if monetary relief is requested, including, without limitation: attorney fees and costs; financial losses claimed in numerical paragraph 14 of the Complaint; damages incurred by Complainant's daughter as claimed in numerical paragraph 16 of the Complaint; and the business losses claimed in numerical paragraph 14 of the Complaint.

**RESPONSE NO. 8:**

**INTERROGATORY NO. 9.** Please identify the dates and times during which Complainant alleges he was without wireless service that are at issue in the Complaint.

**RESPONSE NO. 9:**

**INTERROGATORY NO. 10.** Please list and identify with specificity the dates on which the Complainant took trips or attended seminars and did not have wireless service as alleged in numerical paragraph 14 of the Complaint.

**RESPONSE NO. 10:**

**INTERROGATORY NO. 11.** Please identify any contract Cingular had with Pars International Corporation to provide the telephone or wireless service that is at issue in this matter.

**RESPONSE NO. 11:**

**INTERROGATORY NO. 12.** Please identify any damages claimed in this action that were suffered by Pars International Corporation or in relation to any business conducted by Complainant with Pars International Corporation.

**RESPONSE NO. 12:**

**INTERROGATORY NO. 13.** Please explain in detail the legal and factual basis for your allegations of deliberate and conscious acts and defamation set forth in numerical paragraph 20 of the Complaint.

**RESPONSE NO. 13:**

**INTERROGATORY NO. 14.** Please explain in detail the legal and factual basis for your allegations of severe emotional distress, loss of reputation, and impairment of social standing set forth in numerical paragraph 26 of the Complaint.

**RESPONSE NO. 14:**

**INTERROGATORY NO. 15.** Please identify each allegedly defamatory and derogatory message allegedly made by the Defendant, including the date of the message, the content of the message, the recipient, and the means the message was obtained.

**RESPONSE NO. 15:**

**INTERROGATORY NO. 16.** Please explain in detail the legal and factual basis for your allegations of violations of the state and federal statutes set forth in numerical paragraph 27 of the Complaint.

**RESPONSE NO. 16:**

**INTERROGATORY NO. 17.** Please identify the number that was used as the password identified in numerical paragraph 31 of the Complaint.

**RESPONSE NO. 17:**

**INTERROGATORY NO. 18.** Please indicate what notice was provided as alleged in numerical paragraph 33 of the Complaint, including the means notice was provided, the content of the notice, the date of the notice, and the person to whom such notice was provided.

**RESPONSE NO. 18:**

**INTERROGATORY NO. 19.** Please explain in detail the legal and factual basis for your allegations in numerical paragraph 36 of the Complaint.

**RESPONSE NO. 19:**

**INTERROGATORY NO. 20.** Please explain in detail the legal and factual basis for your allegations in numerical paragraph 37 of the Complaint.

**RESPONSE NO. 20:**

**INTERROGATORY NO. 21:** Please identify any other person who is the source of the claims at issue in this matter fully, including, without limitation, Complainant's daughter, giving his or her full name, date of birth, residence address, business address, occupation, social security number, marital status, and if applicable, names of current and former spouses.

**RESPONSE NO. 21:**

**INTERROGATORY NO. 22:** Please explain in detail the legal and factual basis for your allegations of fraud set forth in numerical paragraph 15 of the Complaint.

**RESPONSE NO. 22:**

**INTERROGATORY NO. 23:** Please explain in detail the legal and factual basis for your allegations set forth in numerical paragraph 21 of the Complaint.

**RESPONSE NO. 23:**

**INTERROGATORY NO. 24:** Please explain in detail the legal and factual basis for your allegations of intent set forth in numerical paragraph 23 of the Complaint.

**RESPONSE NO. 24:**

**INTERROGATORY NO. 25:** Please explain in detail the legal and factual basis for your allegations of intent set forth in numerical paragraph 24 of the Complaint.

**RESPONSE NO. 25:**

**INTERROGATORY NO. 26:** Please explain in detail the legal and factual basis for

your allegations of intent set forth in numerical paragraph 25 of the Complaint.

**RESPONSE NO. 26:**

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST NO. 1:** Please provide a copy of any and all bills or other documentary evidence which support any of the expenses or damages that you claim to have incurred as a result of the occurrence alleged in your Complaint, including canceled checks, invoices, and receipts.

**RESPONSE NO. 1:**

**REQUEST NO. 2:** Please provide a copy of any and all documentary evidence which supports your claims in this matter, including billing statements, canceled checks, invoices, receipts, and correspondence.

**RESPONSE NO. 2:**

**REQUEST NO. 3:** Please provide a copy of any and all documentary evidence which supports your responses to the Interrogatories set forth above.

**RESPONSE NO. 3:**

**REQUEST NO. 4:** Please provide copies of all written or otherwise recorded statements which have been taken from any person regarding, addressing, or concerning this action, the allegations in the Complainant's Complaint, or the complained-of incident.

**RESPONSE NO. 4:**

**REQUEST NO. 5:** Please provide a copy of any and all exhibits Complainant intends to use at the formal hearing in this matter.

**RESPONSE NO. 5:**

**REQUEST NO. 6:** Produce for copying and/or inspection all correspondence or other communications you engaged in with the defendant or any other persons, entities, or parties concerning the occurrence complained of or damages you attribute to that occurrence.

**RESPONSE NO. 6:**

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mary Elisabeth Naumann", written over a horizontal line.

Jeffrey J. Yost

Mary Elisabeth Naumann

Jackson Kelly PLLC

175 East Main Street, Suite 500

Lexington, Kentucky 40507

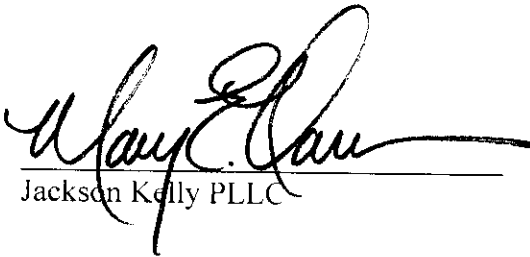
(859) 255-9500

*Counsel for BellSouth Mobility, LLC d/b/a Cingular  
Wireless*

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing was served by depositing a copy in the United States mail,  
First Class, postage prepaid and addressed to the following, on this 9<sup>th</sup> day of March, 2004.

Saeid Shafizadeh, Complainant  
Attorney at Law  
P.O. Box 21244  
Louisville, Kentucky 40221

  
Jackson Kelly PLLC

5864.321